



Marshall H. Fishman
+1 212 813 8851
MFishman@goodwinlaw.com

Goodwin Procter LLP
The New York Times Building
620 Eighth Avenue
New York, NY 10018
goodwinlaw.com
+1 212 813 8800

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VIA ECF

Honorable Victor Marrero
United States District Judge
United States District Court for the Southern District of New York
500 Pearl Street, Suite 1040
New York, New York 10007

Re: *Ramchandani v. Citigroup, Inc., et al.*, 19-cv-09124 (VM) (SDA)

Dear Judge Marrero:

We write on behalf of Defendants Citigroup Inc., Citicorp LLC and Citibank, N.A. (collectively, "Citi") to oppose Plaintiff Rohan Ramchandani's ("Plaintiff") request for an extension until October 6, 2022 (ECF No. 127) to respond to Citi's anticipated pre-motion letter. Pursuant to Your Honor's Individual Practices II.A.2, Plaintiff is required to respond to Citi's pre-motion letter within two business days, but we nevertheless advised Plaintiff's counsel that we would consent to a one-week extension from the deadline required under Your Honor's rules if Plaintiff wished to seek one. As we indicated in our August 23, 2022 letter (ECF No. 126), we intend to file a pre-motion letter on or before September 14, and in that letter, we intend to preview the summary judgment arguments that we seek to fully brief and request a briefing schedule to do so. We see no basis to grant Plaintiff more than a one-week extension to respond to Citi's anticipated three-page pre-motion letter, which will only further delay summary judgment briefing.

Respectfully submitted,

/s/ Marshall H. Fishman

Marshall H. Fishman

cc: All counsel of record (via e-mail)